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March 31, 1999

Dockets Management
Branch HFA-305
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Docket #98N-1038: Irradiation in the production, processing and handling of food

Dear Sir or Madam:

It is my understanding that the FDA is considering changes to present labeling requirements for irradiated food. I understand that you are considering eliminating the requirement that such labeling be prominently displayed, and/or allowing food manufacturers to display only the radura logo, without explanatory words. I would like to register my strong protest to any such changes.

The current system, which mandates the prominent display of words to the effect that food has been irradiated, quite simply, lets consumers know that food has been irradiated. Without such information, consumers have no meaningful basis upon which to choose for themselves which kinds of food they want to buy and ingest.

The word "irradiation" does not intrinsically carry a negative or positive connotation: it conveys the simple fact that the food has undergone the irradiation process. I understand that some irradiated food groups worry that consumers will be too afraid of the word "irradiation" to buy labeled foods. Keeping consumers in the dark as to what they are buying is no way to combat any such fear. Freedom requires informed choice. Irradiated food manufacturers are free to inform consumers as to the safety and/or benefits of irradiation. They should not be permitted to hide within a fine-print list of ingredients or inside the completely non-descriptive radura logo.

This leads me to my next point, which is that the radura logo, on its own, is not descriptive enough to inform consumers that the food has been irradiated. If it were, irradiated food interests would not be pushing the FDA to allow them to use the logo alone. If the logo alone were descriptive of the irradiation process, then the logo and the disclosure statement would simply be redundant, and there would be no point in dropping the disclosure statement.

Instead, it is my belief that irradiated food groups know full well that the public does not know what the symbol means. I am sure that a simple poll would confirm this quite

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readily. Speaking for myself, I did not know what the logo signified until I was alerted (yesterday) to the fact that the FDA was considering changing current regulations. How is one to know that a circle with a sort of flower-like symbol inside means that food has been irradiated? Certainly, if there has been a public information campaign on the issue, it did not reach me, and yet I consider myself relatively informed on health and food issues.

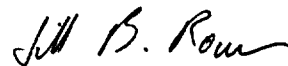
I am aware that the irradiation process has been deemed safe by the FDA and the irradiated food industry. I am also aware that irradiation can extend shelf life and reduce pathogens. However, many consumers would prefer to wait for longer-term studies before deciding whether or not to go ahead and ingest irradiated foods. Without *informative* labeling, the FDA and the irradiated food industry effectively take that choice away from the consumer. They take away consumers' freedom to decide for themselves what to take into their own bodies.

I am also aware that the original decision to require prominent labeling was partially dependent on the fact that irradiation changes the characteristics of food. Again, without *informative* labeling, consumers cannot choose for themselves what kind of food they will put on their table.


Finally, I would like to address your question of whether there should be a specified date for the future expiration of the radiation disclosure statement. My answer is an emphatic no. Choosing a specified date allows the irradiated food industry to continue selling their products without a public information campaign, and without real long-term studies *proving* to consumers that their foods are as healthy as non-irradiated foods. On the other hand, requiring both public *understanding* (perhaps universal awareness of the meaning of the radura logo) and public *confidence* before the disclosure statement can be altered puts the burden where it rightly belongs, on the irradiated food groups. Permitting a guaranteed expiration date leaves the burden on the consumer.

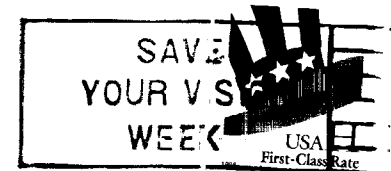
I thank you for taking the time to read this letter. Please mark me down as a consumer opposed to changes in the current labeling requirements.

Respectfully yours,

A handwritten signature in cursive script, reading "Jill B. Rowe".

Jill B. Rowe

 Jill Rowe
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